

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Juan Claudio Maria Cristina Quinones Debtors CrossCountry Mortgage, LLC Movant vs. Juan Claudio Maria Cristina Quinones Kenneth E. West, Trustee Respondents	BK NO. 23-11033 PMM Chapter 13 Hearing Date: 06/27/23
--	--

**OBJECTION OF CROSSCOUNTRY MORTGAGE, LLC
TO CONFIRMATION OF CHAPTER 13 PLAN**

CrossCountry Mortgage, LLC (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. The claims bar date is June 19, 2023. Secured Creditor intends to file a claim on or before the bar date with pre-petition arrears estimated at \$1,548.86.
2. Debtor's Plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$1,548.86 and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, CrossCountry Mortgage, LLC, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: May 30, 2023

By: /s/Denise Carlon, Esquire
Denise Carlon, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-627-1322
Attorney for Movant/Applicant